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Southern California Edison Company

6090 NORTH IRWINDALE AVENUE
IRWINDALE, CALIFORNIA 91702

May 3, 1994

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92-166

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Reference: CC DOCKET NO. 92166
AMENDMENT OF THE COMMISSION'S RULES
TO ESTABLISH RULES AND POLICIES PERTAINING
TO A MOBILE SATELLITE SERVICE IN THE 1610-1626.5/2483.5-2500MHz
FREQUENCY BANDS

Dear Mr. Secretary,

This letter is being written to urge the Federal Communications Commission to adopt rules that will license satellite systems to provide voice and data for Mobile Satellite Services (MSS) in the 1610-1626.5/2483.5-2500 MHz band of the electromagnetic spectrum. SCE Corp. is a corporation with revenues of \$7.8 billion in 1993. SCE Corp. is the parent corporation of Southern California Edison Company and the Mission Companies. Headquarters for the corporation are in Rosemead, California, and SCE Corp. has assets of more than \$21 billion. Edison is the nation's second-largest utility, based on the number of customers. The 107 year old investor-owned utility serves more than 4.1 million customers in central and southern California. Its 50,000 sq. mile service territory has a population of nearly 11 million. The Mission Companies include Mission Energy Company, one of the nation's largest non-utility power producers, Mission First Financial and Mission land Company. They operate in domestic and international markets.

Several hundred SCE Corp. management and technical employees routinely travel both inside and outside the United States. On average, the employees trip length is about 10 days. This travel is for a variety of important business reasons, including overseeing domestic and international operations and sales of products and services. This business travel often takes key employees to rural areas or countries that lack a sophisticated communications network.

The new MSS Service that the Commission seeks to license would contribute to SCE Corp's business operations in several respects. First, in today's competitive global business environment tools that permit SCE Corp. to be more responsive to customers and its own operations have become indispensable. Mobile staff in particular travel with cellular phones to permit contact with corporate facilities, customers, or vendors. Expanding cellular-like convenience to every part of the globe for on-demand-calling, wherever SCE Corp's staff might be, would be helpful in developing countries. Low Earth Orbit satellites enable truly portable hand-held voice communication regardless of the presence of an adequate telecommunications infrastructure.

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Second, the ability to originate calls from headquarters or branch offices to ubiquitous mobile staff is important to insure responsive communication. A single phone number that will enable the company to contact employees regardless of their location is quite appealing. This is being developed for example, by Motorola for its IRIDIUM system.

Third, only low earth orbit satellites that have 100% global coverage will completely satisfy the current and potential operating needs of U.S. businesses abroad. This will be an important facet of global competition in the future. U.S. companies need to take a lead role to prevent Japan, Inc. from capturing yet another business opportunity.

The Commission should favorably consider the beneficial impact of ubiquitous, on-demand communications via hand-held phones that Low Earth Orbit satellite systems will make a reality. The spirit of competition that is developing among the MSS applicants will be of benefit to users of this fledgling industry. MSS Systems such as Motorola's IRIDIUM System will meet the mobile communication needs for U.S. companies to be competitive abroad and to expand opportunities within the U.S. for related high technology products. Hand-held mobile satellite communications will greatly enhance the competitiveness of U.S. companies on the international scene. LEO's will offer much better voice performance compared to Geo synchronous satellites due to much smaller signal travel time delays.

The opportunity to comment on the important issues before the FCC is appreciated..

Sincerely,

A handwritten signature in dark ink, appearing to read "Ross A. Fernandes". The signature is fluid and cursive, with the first name "Ross" written in a slightly larger, more prominent script than the last name.

Dr. Roosevelt A. Fernandes
Senior Research Scientist
Grid Management

Attachment

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MAIL ROOM

**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the matter of

**Amendment of the Commission's Rules to
Establish Rules and Policies Pertaining
to a Mobile Satellite Service in the
1610-1626.5/2483.5-2500 MHz**

CC Docket No 92-166

COMMENTS OF SCE CORP.

In response to the Commissions' invitation, Southern California Edison (SCE) Corp. hereby submits its comments on the Notice of Proposed Rule Making ("NPRM") issued by the Commission in this proceeding, which involves the licensing of satellite systems to provide voice and data Mobile Satellite Services ("MSS") in the 1610-1626.5/2583.5-2500 MHz band of the electromagnetic spectrum. In the NPRM, the Commission specifically invited potential users to identify "their anticipated use or uses of MSS above 1 GHz systems" including a discussion of whether equivalent services can be provided by low-earth orbit ("LEO") and geo stationary ("GSO") satellite systems, and the extent to which alternative terrestrial services are available. See NPRM at 13.

SCE Corp. encourages the introduction of the proposed service and urges the Commission to adopt rules that will secure the substantial benefits to flow from MSS Service, including predominately the capacity of MSS Systems to deliver truly global voice and data services.

SCE Corp. is a large multi-national corporation with \$7.8 billion in revenue for fiscal 1993. SCE provides electric energy service to over four million customers covering a service area of 50,000 sq. miles in Southern California. SCE Corp. is headquartered in Rosemead, California and has assets of more than \$21 billion. SCE Corp's Mission Energy, non-utility subsidiary, is developing \$2.5 billion power project in Indonesia, a \$1 billion power project in Italy, a \$.5 billion power project in the United Kingdom, and has ongoing projects in Australia and other countries spanning all segments of the globe. SCE Corp's managerial and technical employees have to travel outside the United States at least once every year, logging thousands of flyer miles. Such travel is for a variety of important corporate business functions, including the marketing of power plants and related energy services, and negotiation of international financing agreements, and/or the scoping out of investment opportunities abroad. International travel is an integral and important part of the business of large U.S. corporations whose business frequently takes managers and technical employees to places that lack a sophisticated communications network.

Similarly, in many of the countries where SCE Corp. operates, the telephone density as well as the quality of the wire-line telecommunications infrastructure are considerably lower than in the United States. Moreover, SCE Corp. has considered investments in other developing countries and has been deterred by the lack of infrastructure, including communications infrastructure.

SCE Corp. encourages the development of satellite systems that are capable of providing world-wide mobile service. The availability of such a service will provide significant benefits to U.S. businesses. Mobile terminals with the capability of accessing other mobile terminals as well as all switched telecommunications systems world-wide will dramatically enhance international marketing efforts, make new markets accessible to U.S. products and services, and accelerate decision -making

and support travelling U.S. personnel. The new service will also allow SCE Corp. to consider investment decisions that would otherwise be inhibited by the lack of infrastructure in developing countries. In short, SCE Corp. views MSS as an important catalyst facilitating the conduct of international business by U.S. enterprises and enhancing the continuing integration of the world economies and markets, of which U.S. companies are bound to be a prime beneficiary.

It is important to note that world-wide coverage is an inherent element of MSS, and is the single most important advantage of MSS over terrestrial mobile services. While a system capable of providing mobile voice and data service only to the United States is useful to SCE Corp. and other business users, this would not capture all of the benefits for U.S. competitiveness world-wide. Indeed, while SCE Corp's needs could be served by a terrestrial system, maximum use of the spectrum would best be achieved through deployment of MSS. This would be in keeping with the Commission's desire to make maximum use of the spectrum and orbital locations. By allowing the use of the spectrum for MSS the Commission would not be providing use of the spectrum for consumer needs that can already be met in large part with terrestrial technologies. It would also spur the competitiveness of U.S. industry abroad and protect some new opportunities for U.S. manufacturers.

The capacity of the planned MSS Systems for world-wide service is possible because most of those systems, for example, Motorola's IRIDIUM System employ "low-earth-orbit" satellites that rotate around the earth in several non-equatorial orbits, so that virtually all parts of the globe are visible from at least one satellite of the system. Satellite systems employing geo-stationary satellites alone in an equatorial orbit are inherently incapable of providing global service because of the limited footprint of the satellite.

The Commission is urged to expeditiously establish rules and Policies that would allow all of the qualified LEO applicants to compete.